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SUPREME COURT
OF THE STATE OF COLORADO

MAY 27 1976

IN THE

SUPREME COURT
STATE OF COLORADO

Richard D. Turelli-

NC. 27044

A, B, C, D, E, F, G, and H,

Petitioners,

٧.

THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT and THE HONORABLE LEONARD PLANK, Judge thereof,

Respondents,

٧.

ATTORNEY Q,

Intervenor.

MOTION FOR

STAY OF EXECUTION

COME NOW the Petitioners, by and through their attorney, Jon L. Holm, of the firm of Holm, Willis & Dill, Professional Corporation, and respectfully move this Court for a Stay of Execution on your decision and order entered May 24, 1976,

AND AS GROUNDS THEREFORE states to the Court as follows:

1. Counsel for Petitioners will file with the United States Supreme Court, as soon as possible, a request for a Writ of Certiorari to review the decision of this Honorable Court in the above-captioned matter delivered on May 24, 1976.

- 2. Counsel for Petitioners states that he will, within the next 15 days, file with this Court a Motion to Reconsider its decision in the above-captioned matter.
- 3. That the Denver County Grand Jury is continuing its investigation of this matter and has, within the last day, issued subpoenas to continue such investigation.
- 4. That it is impossible for counsel for Petitioners to prepare a Motion to Reconsider to this Honorable Court; a Motion for a Writ of Certiorari to the United States Supreme Court; and a Motion for a Stay to the United States Supreme Court, prior to the Denver County Grand Jury's reinstituting its investigation at 7:30 p.m. on May 27, 1976.

NOW THEREFORE:

Petitioners respectfully request that this Honorable Court issue a Stay of the decision and order issued in this matter until counsel has had the opportunity to file with this Court a Motion to Reconsider;

FURTHER;

That this Court issue a Stay of Execution on its decision and order until counsel for Petitioners has had the opportunity to file with the United States Supreme Court a Motion for a Stay in this matter and a Writ of Certiorari;

FURTHER;

That such Stay be in effect until the United States

Supreme Court has decided to accept or reject Petitioners' request

for a Stay and a Writ of Certiorari.

RESPECTFULLY SUBMITTED this 27th day of May, 1976

Ву

JON L. HOLM (2220)
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